

## REMARKS

Rejection of claims 1-5, 9-13 and 15-16 under 35 U.S.C. § 102 (b) as being anticipated by US 4,760,570 (Acampora)

Applicants respectfully traverse the rejection of claims 1-5, 9-13 and 15-16.

Applicants submit that Acampora does not anticipate, either expressly or inherently, each and every element as set forth in independent claim 1. Specifically, independent claim 1 recites a method for providing distributed switching of data...comprising the elements “*informing the selected destination module of the inbound time slot of the plurality of inbound time slots*” and “*receiving, by the selected destination module, the broadcast data via the inbound time slot.*” Neither of these elements is anticipated expressly or inherently by Acampora.

Acampora is directed to a switching arrangement for routing a fixed-length of packets from N inputs to N outputs. See col. 2, lines 20-23. The switching arrangement has an N-by-N packet switch that interfaces N inputs and N outputs. See FIG. 1, element 11. The packet switch has a bus interface at each output for receiving the packets at *each time slot* from the N inputs. See FIG. 1, element 15, col. 4, lines 53-55, and FIG. 3. The bus interface has a filter for filtering the received fixed-length packets and a shared buffer for buffering the fixed-length packets destined to a respective output. See col. 4, lines 41-50, and lines 55-58. The bus interface uses a FIFO type shared buffer that sends the buffered packets at *each and every time slot* to the output. See col. 4, lines 58- 61, and col. 3, lines 58-64.

Applicants respectfully disagree with the statement on page 2, item 2, of the Office Action that Acampora discloses “*informing the selected destination module of the inbound time slot of the plurality of inbound time slots.*” The Office Action specifically refers to col. 4, lines 47-50, as describing or being analogous to Applicant’s claim limitation of “*informing the selected destination module of the inbound time slot of the*

plurality of inbound time slots.” Applicants assert that the Office Action mischaracterizes Acampora. As mentioned above, Acampora discloses that the bus interface within the switch receives packets from the inputs at *every time slot*. Further, the bus interface buffers the packets in a shared buffer and sends the packets at *every time slot* to the output. See Acampora FIGS. 1 and 3; col. 4, lines 53-55 and lines 58-61; and col. 3, lines 58-64. Because the outputs receive packets at *every time slot*, the outputs do not need to be informed and are not informed of the inbound time slot as recited by Applicants’ claim 1. Further, because Acampora does not disclose “informing the selected destination module of the inbound time slot,” Acampora also does not disclose “receiving, by the selected destination module, the broadcast data via the inbound time slot” which is also recited in Applicants’ claim 1.

Regarding independent claim 9, Applicants respectfully submit that the above discussed arguments apply equally. In particular, Acampora does not disclose “a controller . . . wherein the controller . . . conveys to the selected destination module information concerning a data line and *a time slot via which the call data will be broadcast*.”

In view of the foregoing, Applicants respectfully submit that Acampora does not disclose each and every limitation of claims 1 and 9 and thus these claims are patentable over Acampora. Applicants submit that dependent claims 2-5, 10-13, 15, and 16 are patentable by virtue of their dependency on claims 1 and 9, respectively. Thus the rejection of claims 1-5, 9-13 and 15-16 should be withdrawn and the claims passed to allowance.

Rejection of claims 6 and 14 under 35 U.S.C. § 103 (a) as being unpatentable over US 4,760,570 (Acampora)

Applicants submit that dependent claims 6 and 14 are patentable by virtue of their dependency on claims 1 and 9, respectively. Thus, the rejection of claims 6 and 14 should be withdrawn and the claims should pass to allowance.

Rejection of Claims 7, 8, 17-24 under 35 U.S.C. § 103 (a) as being unpatentable over US 4,760,570 (Acampora) in view of US 4,392,222 (Ando)

Regarding claims 7 and 8, as mentioned above, Applicants respectfully submit that Acampora does not disclose “informing the selected destination module of the inbound time slot of the plurality of inbound time slots” and “receiving, by the selected destination module, the broadcast data via the inbound time slot” as recited in claim 1. Regarding claims 17-19, as mentioned above, Acampora fails to disclose “a controller . . . wherein the controller . . . conveys to the selected destination module information concerning a data line and *a time slot via which the call data will be broadcast*” as recited in claim 9. Because Acampora does not teach or suggest such limitations, the combination of Acampora with Ando also fails to disclose Applicants’ claimed invention. Thus, the rejection of claims 7, 8 and 17-19 should be withdrawn and the claims passed to allowance.

Applicants respectfully traverse the rejection of claim 20. Reconsideration is respectfully requested based on the arguments below.

In the Office Action on page 7, item (3) it is acknowledged that Acampora et al. does not disclose allocating an outbound time slot for use in transferring outbound data from a selected destination module to the source module; tagging the data to produce tagged data; and embedding by the destination module the tagged data in the allocated outbound time slot.” The Office Action references Ando for these teachings. Specifically, the Office Action states “Ando teaches attaching address information to

data in order to identify the terminal to receive the data (column 4, lines 44-51; the receiving terminal inherently identifies its destination of the data based on the address information and further process the data after receiving it).” Please note that the Office Action has referred to the limitations of claim 23, and not to the limitations of claim 20 in citing Acampora and Ando.

Applicants respectfully submit that neither Ando, nor Acampora, alone or in combination teaches or suggests all the claim limitations as set forth in independent claim 20. Specifically, independent claim 20 requires “*a selected destination module...applies a tag to data to produce tagged data, conveys the tagged data...to the source module, and wherein the tag indicates that the data included in the time slot is to be forwarded by the source module,*” which are not taught or suggested in Ando or in the combination of Acampora and Ando.

It appears that the Office Action is equating Applicants’ destination and source modules to Ando’s receiving and sending terminals, respectively. However, Ando is directed to an exchange system wherein a receiving terminal (equated to destination module) receives a call request signal from a sending terminal (equated to source module) via an exchange. See col. 4, lines 20- 24. In return, the receiving terminal responds by sending an acknowledgement signal via the exchange. The exchange is a switching unit that interfaces the sending terminal and the receiving terminal. The exchange receives the acknowledgement signal from the receiving terminal and assembles the acknowledgement signal into a packet. See FIG.1 and col. 4, lines 33-44, lines 47-51. The exchange, which interfaces the sending and receiving terminals, further transmits the assembled packet to the sending terminal. See col. 4, lines 51-54. Thus, the packet is assembled and conveyed by the exchange which is not the receiving terminal (equated to destination module). In contrast, Applicant’s claim 20 recites “*a selected destination module...applies a tag to data to produce tagged data, conveys the tagged data...to the source module.*” Additionally, Ando discloses that the acknowledgement signal relates to information received in the downward direction channel through which the call request signal is received from the sending terminal.

Thus, the acknowledgement signal relates to information of the downward direction channel, and not the data to be forwarded by the source module. See lines 38-41. In contrast, Applicant's claim recites "the tag indicates that the data included in the time slot is to be forwarded by the source module."

Applicants respectfully traverse the rejection of claim 23. Applicants submit that the above arguments apply equally to the limitations of claim 23.

In view of the foregoing, Applicants respectfully submit that the combination of Acampora and Ando does not disclose each and every limitation of claims 20 and 23 and thus these claims are patentable over the combination of Acampora and Ando. Applicants submit that dependent claims 21, 22 and 24 are patentable by virtue of their dependency on claims 20 and 23, respectively. Thus the rejection of claims 20-24 should be removed and the claims passed to allowance.

Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below. Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,  
Ladden, Gregory et al.

**SEND CORRESPONDENCE TO:**

Motorola, Inc.  
Law Department

Customer Number: **22917**

By: /Lalita W. Pace/

Lalita W. Pace  
Attorney for Applicant  
Registration No.: 39,427  
Telephone: 847-538-5855  
Fax: 847-576-3750